Hon. Christopher M. Alston 1 Chapter 7 Hearing Date: September 20, 2019 2 Hearing Time: 9:30 a.m. 3 Hearing Site: 700 Stewart St., #7206 Seattle, WA 98101 4 Response Date: September 13, 2019 5 6 UNITED STATES BANKRUPTCY COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 IN RE: 9 Chapter 7 10 No. 18-14820-CMA SAMIA EL-MOSLIMANY, 11 12 DECLARATION OF ANTHONY S. WISEN 13 Debtor. 14 15 I, Anthony S. Wisen, declare as follows: 16 17 1. I am an attorney with the Law Offices of Anthony S. Wisen, PLLC, counsel to 18 plaintiff Hayat Sindi ("Creditor" or "Dr. Sindi"). My WSBA number is 39656. I am 19 competent to make this Declaration. I have personal knowledge of, or have confirmed through 20 my review of court filings and publicly recorded documents, the facts stated in this Declaration 21 and know them to be true and correct. 22 2. A true and correct copy of the Amended Final Judgment entered in the matter 23 Hayat Sindi v. Samia El-Moslimany and Ann El-Moslimany, United States District Court for 24 25 DECLARATION OF ANTHONY S. WISEN - 1 Law Offices of Anthony S. Wisen, PLLC 26 (No. 18-14820-TWD) 1752 NW Market St., # 709 Seattle, WA 98107 206.418-8720 · tony@wisenlaw.com 27

the District of Massachusetts Case No. 13-cv-10798-IT (the "Massachusetts Lawsuit"), dated October 6, 2016, is attached as **Exhibit A** hereto.

- 3. On November 15, 2016, Dr. Sindi filed a Motion for Certified Copy of Judgement in the Massachusetts Lawsuit, a true and correct copy of which is attached as **Exhibit B** hereto. A chief purpose of the motion was to obtain a judgment lien in Debtor's residence in Burien, Washington. *See, e.g.,* ¶¶ 5-7.
- 4. On December 13, 2016, Judge Talwani entered an electronic order in the Massachusetts Lawsuit, allowing Dr. Sindi's Motion, and directing the Clerk to issue a certified copy of the Amended Final Judgment. A true and correct copy of the relevant docket entry, Dkt. No. 233, is attached as **Exhibit C** hereto.
- 5. On February 10, 2017, the Debtor¹ filed a Motion to Stay Without Bond in the Massachusetts Lawsuit. A true and correct copy of this motion is attached as <u>Exhibit D</u> hereto. The Motion was denied on February 28, 2017. A true and correct copy of the Court's Order is attached as <u>Exhibit E</u> hereto.
- 6. On January 3, 2017, Dr. Sindi registered the Amended Final Judgment in the Western District of Washington under Case No. 2:17-mc-0001. Then, on February 27, 2017, Dr. Sindi recorded the Notice of Judgment Lien Against Homestead Property, along with an official copy of the Amended Final Judgment in the King County Real Property Records under Assessor's Number 20170227001230. A true and correct copy of the recorded document is attached as **Exhibit F** hereto.

¹ Together with Ann-Moslimany, her mother and the co-defendant in the Massachusetts Lawsuit.

- 7. A true and correct copy of the Second Amended Final Judgment entered in the Massachusetts Lawsuit, dated August 17, 2018, is attached as **Exhibit G** hereto.
- 8. Dr. Sindi subsequently registered the Second Amended Final Judgment in King County Superior Court under Case No. 18-2-22410-1 KNT, and on September 25, 2018, recorded the resulting Foreign Judgment in the King County Real Property Records under Assessor's Number 20180925000965. A true and correct copy of the recorded document is attached as **Exhibit H** hereto.
- 9. On or about November 1, 2018, I obtained a Litigation Guarantee from First American Title Insurance Company, which concerns the Debtor's property in Burien, Washington. A true and correct copy of the Litigation Guarantee (without exhibits) is attached as **Exhibit I** hereto.
- 10. On December 20, 2018, Debtor filed the instant bankruptcy. The judgment in favor of Plaintiff is scheduled in the amount of \$1,548,500.00. A true and correct copy of Dr. Sindi's Proof of Claim, filed in the amount of \$1,550,298.45, is attached as **Exhibit J** hereto.

DATED this 13th day of September, 2019.

Law Offices of Anthony S. Wisen, PLLC Attorneys for Hayat Sindi

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DECLARATION OF ANTHONY S. WISEN - 3 (No. 18-14820-TWD)

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